

MEMO ENDORSED

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November 23, 2021

VIA ECF

Hon. Kenneth M. Karas
United States District Court
Southern District of New York
United States Courthouse
300 Quarropas Street, Chambers 533
White Plains, NY 10601-4150

Re: Ashley Travers, LPN v. CareMount Medical, P.C., et al.
Case No.: 7:20-cv-10442(KMK)(AEK)

Dear Judge Karas:

We represent Defendants in the above referenced matter. We write jointly with Plaintiff's counsel to respectfully request that the Case Management Conference set for December 16, 2021 be adjourned by thirty (30) days.

Pursuant to Your Honor's Individual Rules, Section 1, C: (1) the original date for the Case Management Conference is December 16, 2021; (2) the Parties made one request for an extension of the discovery deadline on August 23, 2021; (3) the previous extension request was granted; and (4) this is a joint request on behalf of the parties.

The Parties request this extension for the following reasons. First, during the Status Conference with Magistrate Krause held on November 19, 2021, the Parties confirmed that the remaining depositions and all other discovery would be completed by December 30, 2021. Second, the Parties have agreed to participate in a settlement conference with Magistrate Krause on January 13, 2022. In an effort to complete discovery and potentially resolve this matter prior to the Case Management Conference, the Parties jointly and respectfully request this adjournment of the Case Management Conference.

Thank you for your courtesy and attention to this request.

Respectfully submitted,

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cc: Jimmy M. Santos, Esq., Plaintiff's Counsel (via ECF)

*Granted. The Court will hold a
teleconference on 1/27/2022 at
11:30 AM*

SO ORDERED

*KENNETH M. KARAS U.S.D.J.
11/23/2021*